

Comments Received Via E-mail From Howard Geller, Executive Director, Southwest Energy Efficiency Project (SWEEP)

SWEEP is signing onto other joint comments being provided in response to the ENERGY STAR homes proposal. There is one issue, the windows requirements in the prescriptive path, that we want to comment directly on. SWEEP has done considerable research on the technical feasibility and cost effectiveness of high efficiency fenestration products in homes in the Southwest. Last year we issued two reports on this topic, one on energy performance and related issues and the other on policies and programs for expanding the use of high efficiency windows and other fenestration products. In these reports, we determined that it makes sense, i.e., it is cost effective and saves substantial electricity and peak demand, to adopt low solar gain windows (SHGC < 0.40) in new air conditioned homes throughout the Southwest. This means in places like metropolitan Denver and Salt Lake City, not just in very hot areas such as Phoenix or Las Vegas. The two reports are attached.

The vast majority of new single family homes being built throughout the Southwest region include central air conditioning. Also, there is a substantial cooling season and very hot periods in the summer in places like metropolitan Denver and Salt Lake City. Furthermore, summer peak load is increasing rapidly in these areas and this is a big problem for utilities. Rapidly rising peak demand is forcing utilities to make very costly investments in new power plants and power distribution infrastructure. Utilities throughout the region are now promoting low solar gain windows even in areas where low solar gain is not required in order to qualify for the ENERGY STAR windows label or for compliance with the IECC model code. For example, Utah Power has started a new homes program in Utah involving builder training and incentives. In order to qualify for incentives, builders must use low solar gain (SHGC < 0.40) windows as well as meet the current ENERGY STAR homes specifications in their new homes.

We strongly urge EPA to modify the windows requirements in the proposed specifications for ENERGY STAR homes. The specifications should require low solar gain windows in a greater portion of the country than is now the case with ENERGY STAR windows. In particular, we believe it would be cost effective and very beneficial to require low solar gain (SHGC < 0.40) windows in climate zones 4 and 5 as well as in zones 1, 2 and 3 which is the implication of the current proposal. The new homes market is moving towards low solar gain windows in much of the country, and the ENERGY STAR homes specifications should at least be aligned with, if not move out in advance of, these market trends.

Thank you for considering these views, and please let me know if you have any questions.